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Attorneys for Defendant,
CITIBANK, N.A.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

IRINA KAGANOVSKY-GREEN, an individual,

Plaintiff,

v.

CITIGROUP INC., a foreign corporation d/b/a
CITIBANK, N.A., a national banking institution;
and TRANS UNION LLC, a limited liability
company; and DOE DEFENDANTS I-XX,
inclusive,

Defendant.

CASE NO. 2:13-cv-02029-JCM-CWH

STIPULATED PROTECTIVE ORDER

PURSUANT to Local Rule 7-1, and FRCP 26(c)(1)(G), the parties by and through their undersigned counsel of record hereby stipulate as follows:

WHEREAS Defendant CITIBANK, N.A. is willing to produce the following confidential documents to Plaintiff subject to protective order:

A. Automated credit dispute verifications (Bates CITI0000058-CITI0000059).

WHEREAS, those documents contain the intellectual property of On-Line Data Exchange LLC ("OLDE"), a third party not involved in this litigation, and is proprietary to OLDE.

WHEREAS, the documents and information relate to trade secrets, confidential research, development, technology or other proprietary information belonging to CMI and/or OLDE, and/or personal income, credit and other confidential information of Plaintiff.

WHEREAS the parties seek to keep the information contained therein confidential;

WHEREAS the parties are amenable to a protective order; THEREFOR, the parties hereby



stipulate as follows:

A. The documents produced by CMI Bates CITI0000058-CITI0000059 shall remain confidential and may not be used in any manner outside of this litigation;

B. Any papers filed with the Court including those documents shall be done so under seal after first filing the appropriate motion with the Court pursuant to Kamakana v. City and State of Honolulu, 447 F.3d 1172 (9th Cir. 2006). Attorneys must file documents under seal using the Court's electronic filing procedures pursuant to Local Rule 10-5(b); and

C. Plaintiff shall return the documents to counsel for CMI upon the resolution of this litigation.

Dated this 29th day of May, 2014

Dated this 29th day of May, 2014

COGBURN LAW OFFICES

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IRINA KAGANOVSKY-GREEN

Attorneys for Defendant,
CITIBANK, N.A.

ORDER

IT IS SO ORDERED _____ May 30 _____, 2014.

UNITED STATES MAGISTRATE JUDGE